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May 21, 2019

VIA ECF

Hon. Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, N.J. 07101

Re: *Valley Chabad, et al. v. Borough of Woodcliff Lake, et al.*
Case No.: 2:16-08087-JLL-JAD

Your Honor:

The undersigned represents Plaintiffs Valley Chabad, Inc. and Rabbi Dov Drizin ("Plaintiffs") in the above-referenced matter. As per Your Honor's Text Order of April 30, 2019, I am writing to report on the status of the outstanding discovery issues.

Despite numerous requests to Defendants, Plaintiffs still have not received from Defendants:

- Responses and Objections to Plaintiffs' First Request for Production of Documents served upon Defendant Rendo;
- Responses and Objections to Plaintiffs' First Request for Production of Documents served upon Defendant Borough;
- Complete interrogatory responses as requested in Plaintiffs' August 3, 2018 letter;
- Responses and Objections to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Rendo;
- Documents responsive to Plaintiffs' document requests from agreed-upon custodians' personal email accounts;
- A privilege log for all documents withheld and redacted on the basis of privilege; and

- Documents responsive to Plaintiffs' document requests from before 2010.

These discovery requests have been pending for more than a year and ten months. Plaintiffs seek the Court's permission to file a motion to compel, as discussed during the January 30 conference.

Respectfully submitted,



Robin N. Pick

cc: All counsel of record via ECF